

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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ETHEREUM VENTURES LLC,

Plaintiff,

-against-

CHE MINING CO LLC and CHET  
STOJANOVICH,

Defendants.

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**NOTICE OF MOTION TO**  
**DISMISS**

Civ. Action No.: 1:19-cv-7949  
(LLS)

**PLEASE TAKE NOTICE**, that the plaintiff ETHEREUM VENTURES LLC, by and through its undersigned attorney, will move this Court for an Order granting the relief described below, at the time and place set forth below:

Moving Party: Plaintiff Ethereum Ventures LLC

Motion Directed To: Defendants Chet Mining Co. LLC and Chet Stojanovich

Relief Sought: Default judgment against defendants Chet Mining Co. LLC and Chet Stojanovich, jointly and severally, pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, and SDNY Local Rule 55.2.

Supporting Papers: The papers offered in support of the motion are: (i) the Attorney Affirmation of Benjamin F. Neidl dated June 4, 2021; (ii) the Declaration of JohnPaul Baric executed June 4, 2021; (iii) the plaintiff's Statement of Damages; and (iv) the plaintiff's proposed Default Judgment.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to SDNY Local Rule 6.1(a) and Rule 6 of the Federal Rules of Civil Procedure, inasmuch as service of this motion is being made upon the defendants by First Class Mail, the defendants' papers in opposition to the motion, if any must be served upon the undersigned attorney and filed with the Court no less than seventeen (17) days from the date of this motion (by June 21, 2021).

Dated: Schenectady, New York  
June 4, 2021

Respectfully submitted,

E. STEWART JONES HACKER MURPHY LLP



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By: Benjamin F. Neidl  
BAR ROLL: BN5818  
*Attorneys for the Plaintiff*  
200 Harborside Drive, Suite 300  
Schenectady, N.Y. 12305  
(518)274-5820